

EXHIBIT

E

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03-md-1570 (GBD)(SN) ECF Case
This document relates to:	15-cv-9903 (GBD) (SN)
<i>Thomas Burnett, Sr., et al. v. The Islamic Republic of Iran, et al.</i>	ECF Case

DECLARATION OF QUINCEYANN BOOKER-JACKSON

I, Quinceyann Booker-Jackson, pursuant to 28 U.S.C. § 1746, do hereby declare under penalty of perjury as follows:

1. I am more than 18 years of age and competent to testify in court to the matters stated below. The statements made in this Declaration are based on my personal knowledge unless otherwise indicated.
2. I was a citizen of the United States on September 11, 2001, and remain so today. Attached as Exhibit A to this Declaration is a true and correct copy of my proof of citizenship.
3. On September 11, 2001, I was present at the World Trade Center when the terrorist attacks of the World Trade Center Towers occurred. I worked for Unique Security on the 61st floor of the World Trade Center for the Port Authority of New York and New Jersey.
4. Despite being afraid of heights and not liking elevators, I worked on the 61st floor at the World Trade Center and rode an elevator to the office every day. Before the 9/11 attacks, it was a happy time in my life where I had a dream job I loved and for the first time in my life I was bringing in a solid income. The attacks that day were especially difficult on me due to my fear of heights and my phobia of elevators.

5. I was in the elevator of the North Tower when the first plane crashed into the tower. We had begun our ascent to the 61th floor when the first plane hit. The elevator rocked hard and the emergency lights came on before it plummeted down to the ground floor. Once the elevator hit the ground floor, the doors blew open. I was in a state of shock. Everyone around me was screaming and running towards the doors to get out of the building. A plain clothes security guard told everyone to get out of the building because there was a bomb. Then people really started to panic, and they were pushing one another down and falling on top of each other in the chaos to escape the building. I remember seeing one person in front of me that was covered in blood as we left the building.

6. Once outside of the North Tower, I witnessed people jumping to their deaths from above. The bodies were landing around me. I started to cry and all I could say was “oh my god” as death, tragedy, and horror were the only things I could see around me. I felt as those I could not escape the hell around me. It felt like a dream but it was a nightmare to which no words can do justice. All I wanted to do was go home. I thought of my family, so I waited in line to try and call my husband from a pay phone to let him know that I was okay.

7. At that time, I saw another airplane appear out of the corner of my eye. It was flying low and at a strange angle. Then it became clear that the second airplane was headed directly for the South Tower. As the second plane slammed into the South Tower, a stranger covered myself and two other individuals with his body to shield us from flying debris. When I looked up afterwards, the stranger’s hair was on fire as he was asking me if I was ok. I felt like I could not breathe by this point. I was grabbed by some people and taken to a nearby building. I was given oxygen but it was impossible to calm down.

8. Thereafter, I was finally able to get to a phone. I called my husband's work phone number and to my surprise my Pastor answered the phone. He told me to get out of New York City immediately. I said okay, but I did not know if he heard me because I was crying so much. As soon as the call ended, an announcement blared overhead telling us to get out of the building because they were concerned that the World Trade Center towers might collapse.

9. A police officer kept telling the crowd to head uptown, but I was not familiar with New York City. The police officer urged us to leave the area. I did not know where I was or where I was going. I stopped in a nearby park where others had gathered. We stood there watching the horror unfolding before our eyes in utter disbelief. I ran into a co-worker of mine while in the park. She told me that she thought our co-workers got out of the tower safely. We stood there crying.

10. We heard someone tell us to leave because they were not sure if the buildings would fall and we were in danger if they did. That's when I heard the rumbling of the towers. I turned around and saw hordes of people running for their lives. The towers were collapsing. I must have been hit because I fell to the ground. I was trampled by people fleeing the path of destruction. I remember saying "Lord please I don't want to die here" and then someone helped me off the ground. I scrambled to the path train to escape. I knew I needed to go home. I ran for the last train and realized I did not have my wallet. I started crying even more. A lady nearby swiped her card twice to get me into the train. I've never seen the train so crowded. Everyone stared at each other on the train while we cried.

11. I finally made it home. I told my husband I was fine but I was not fine. My true horrors were about to begin. For the first two years after the 9/11 attacks, I did not go outside. I

have been unable to work since the 9/11 attacks. I have been on disability since March of 2003. Our family's finances have never been the same. My life has never been the same.

12. As a result of these terrorist attacks, I suffered the following specific injuries on September 11, 2001: a fractured right ankle, as well as injuries to my back and head. I have also suffered from asthma, chronic rhinosinusitis, obstructive sleep apnea, PTSD, panic disorder and major depression as a result of what I experienced and witnessed on September 11, 2001.

13. I sought medical attention for my injuries. Attached as Exhibit B to this Declaration is a true and correct copy of my select relevant medical records related to the treatment that I received following the September 11, 2001 terrorist attacks.

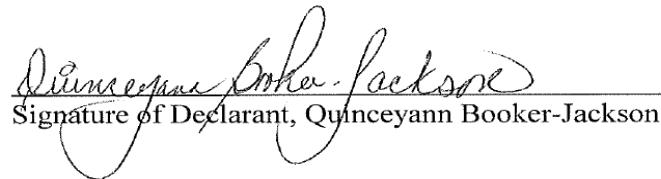
14. In the course of the attack and my escape, I witnessed atrocities beyond the imagination of the average citizen. The situation could only be compared to a war zone. I was going about my everyday life in a peaceful manner when we were brutally attacked by terrorists and my life was altered forever. Thus, as a result of these terrorist attacks and the events that I witnessed, I also began to suffer post-traumatic stress, anxiety and depression.

15. I suffered, and continue to suffer, severe emotional distress as a result of the above terrorist attacks. I suffered and continue to suffer from panic attacks, anxiety and bouts of major depression due to the traumatic events of these terrorist attacks. This act of evil changed my life forever, as well as the lives of my close family members. Since these attacks, I have also been diagnosed with PTSD.

16. I previously pursued a claim (Claim Number Unknown) through the September 11th Victim Compensation Fund specifically related to my physical injuries incurred on September 11, 2001, and my claim was determined to be ineligible for compensation.

I declare UNDER PENALTY OF PERJURY that the foregoing is true and correct.

EXECUTED on this 3 day of January, 2020.



Signature of Declarant, Quinceyann Booker-Jackson

**EXHIBITS
FILED
UNDER SEAL
(ECF No.
5716)**